

BellSouth Telecommunications, Inc.
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August 24, 2001

Guy M. Hicks
General Counsel

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RECEIVED
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EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance
(InterLATA) Service in Tennessee Pursuant to Section 271 of
the Telecommunications Act of 1996*
Docket No. 97-00309

Dear Mr. Waddell:

Enclosed are BellSouth's objections to the consolidated discovery requests submitted by the CLECs. Also enclosed are BellSouth's objections to the separate discovery requests submitted by Sprint. The discovery submitted by the Consumer Advocate Division was served on BellSouth by U.S. Mail and was not received by BellSouth until August 23, 2001. BellSouth anticipates filing objections to that discovery in the near future. Copies of the enclosed are being provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH:ch
Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA Service) in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996*

Docket No. 97-00309

**BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS
TO SPRINT'S FIRST SET OF INTERROGATORIES
AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth") hereby files its objections to Sprint's First Set of Interrogatories and First Request for Production of Documents to BellSouth.

GENERAL OBJECTIONS

1. BellSouth objects to the Interrogatories and Requests for Production to the extent they seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth objects to each and every Interrogatory and Requests for Production to the extent that such Interrogatory and Request for Production calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

3. BellSouth objects to each and every Interrogatory and Request for Production insofar as they are vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such Interrogatories and Requests for Production. Any answers provided by BellSouth in response to these Interrogatories and Requests for Production will be provided subject to, and without waiver of, the foregoing objection.

4. BellSouth objects to each and every Interrogatory and Requests for Production insofar as the Interrogatories and Requests for Production are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this action.

5. BellSouth objects to providing information to the extent that such information is already in the public record before the Authority.

6. BellSouth objects to each and every Interrogatory and Request for Production to the extent that the information requested constitutes "trade secrets" or that would require the disclosure of customer specific information. BellSouth also objects to the disclosure of confidential business information.

7. BellSouth objects to Sprint's Interrogatories, and Requests for Production, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Tennessee Rules of Civil Procedure or Tennessee Law.

8. BellSouth objects to each and every Interrogatory and Request for Production insofar as any of them is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth is a large corporation with employees located in many different locations in Tennessee and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Authority or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these Interrogatories and Request for Production. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the Interrogatories and Requests for Production purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

SPECIFIC OBJECTIONS TO INTERROGATORIES

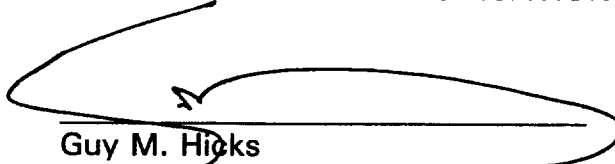
Item No. 8: BellSouth objects to this Request as overbroad and unduly burdensome. BellSouth will consider a narrowed request if Sprint chooses to submit such a revised request.

WHEREFORE, BellSouth respectfully requests that the Authority sustain each of the objections set forth herein. BellSouth specifically reserves the right to make

additional objections as it continues to review the requests and its responses thereto.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "Guy M. Hicks", is written over a horizontal line. The signature is stylized with a large loop at the end.

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Fred McCallum, Jr.
Lisa Foshee
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CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2001, a copy of the foregoing document was served on the parties of record, via hand delivery, facsimile, overnight or US Mail, addressed as follows:

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- ☐ Facsimile
- ☐ Overnight

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KMC Telecom III and V

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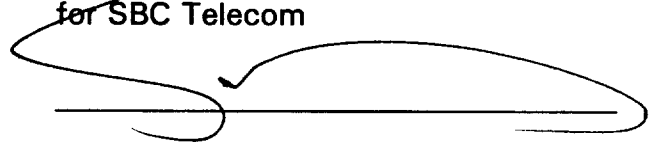
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D. Billye Sanders, Esquire
Waller Lansden, et al.
P. O. Box 198866
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for SBC Telecom

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line and a small checkmark-like flourish.

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA Service) in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996*

Docket No. 97-00309

**BELLSOUTH'S OBJECTIONS TO AT&T COMMUNICATIONS
OF THE SOUTHERN STATES, INC., THE SOUTHEASTERN COMPETITIVE
CARRIERS ASSOCIATION, BROOKS FIBER COMMUNICATIONS
OF TENNESSEE, INC. MCIMETRO ACCESS TRANSMISSION SERVICES,
LLC, TIME WARNER OF THE MID-SOUTH, LP, XO TENNESSEE,
INC. AND DIECA d/b/a COVAD COMMUNICATIONS COMPANY'S FIRST DATA
REQUEST TO BELLSOUTH TELECOMMUNICATIONS, INC.**

BellSouth hereby files its General and Specific Objections to AT&T Communications of the South Central States, Inc. ("AT&T"), the Southeastern Competitive Carriers Associations ("SECCA"), Brooks Fiber Communications of Tennessee, Inc. ("Brooks Fiber") and MCImetro Access Transmission Services, LLC ("MCImetro"), (collectively "WorldCom"), Time Warner Telecom of the Mid-South, LP, ("Time Warner"), XO Tennessee, Inc. ("XO"), and DIECA d/b/a Covad Communications Company's ("COVAD") First Data Requests and states as follows:

GENERAL OBJECTIONS

1. BellSouth objects to the Interrogatories and Requests for Production to the extent they seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth objects to each and every Interrogatory and Requests for Production to the extent that such Interrogatory and Request for Production calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

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SPECIFIC OBJECTIONS TO INTERROGATORIES

Interrogatory No. 21: BellSouth objects to this Request as overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 22: BellSouth objects to this Request as overbroad and unduly burdensome. Subject to and without waiving this objection, BellSouth will response to this request from January 1, 2001 forward.

Interrogatory No. 23: BellSouth objects to this Request on the grounds that it is not relevant and that it is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 24: BellSouth objects to this Request on the grounds that it is overbroad, unduly burdensome, not relevant and not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 27: BellSouth objects to this Request as overbroad, unduly burdensome, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 28: BellSouth objects to this Request as overbroad, unduly burdensome, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 29: BellSouth objects to this Request on the grounds that it is not relevant and that it is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 35: BellSouth objects to providing the identity of the carrier to which a customer migrated on the grounds that this is confidential customer information.

Interrogatory No. 36: BellSouth objects to the statement in this Request that provides that "BellSouth states that the majority of MCI LSRs did not flow through..." without reference to location of or documentation of such statement. Subject to and without waiving this objection, BellSouth will respond to subsections (A),(B) and (C) from May 1, 2001, forward.

Interrogatory No. 37: BellSouth objects to the statement in this Request that provides that "BellSouth has stated that manual work is required..." without reference to location of or documentation of such statement. Subject to and without waiving this objection, BellSouth will respond.

Interrogatory No. 38: BellSouth objects to this Request on the grounds that BellSouth provides CLECs with explanations of CLEC-errors and thus MCI already has this information.

Interrogatory No. 39: BellSouth objects to this Request on the grounds that it is vague.

Interrogatory No. 58: BellSouth objects to this Request to the extent that it asks about retail line sharing because BellSouth does not engage in line sharing for itself.

Interrogatory No. 61: BellSouth objects to this Request to the extent that it asks about retail line sharing because BellSouth does not engage in line sharing for itself.

Interrogatory No. 67: BellSouth objects to this Request to the extent it implies that BellSouth needs to lower its provisioning interval for line shared loops.

Interrogatory No. 69: BellSouth objects to this Request to the extent it implies that BellSouth needs to improve provisioning of line sharing.

Interrogatory No. 72: BellSouth objects to this Request on the grounds that it is overbroad, unduly burdensome to the extent it seeks to require BellSouth to analyze every finding and conclusion in the FCC's order. Subject to and without waiving this objection, BellSouth will provide any comments filed with the FCC.

Interrogatory No. 74: BellSouth objects to this Request on the grounds that it is vague to the extent that it implies that FCC orders do not apply to all states. Subject to and without waiving this objection, BellSouth will respond about the BellSouth Conditional Waiver Order.

Interrogatory No. 82: BellSouth objects to this Request on the grounds that it is not relevant to this proceeding and that it is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 93: BellSouth objects to this Request on the grounds that it is vague as to what type of forecasts to which the Request is referring.

Interrogatory No. 100: BellSouth objects to producing confidential letters of CLECs to BellSouth. BellSouth also objects to this request as overbroad. BellSouth will respond with non-CLEC confidential communications from January 1, 2001.

SPECIFIC OBJECTIONS TO REQUESTS FOR PRODUCTION

POD No. 2: BellSouth objects to this Request on the grounds that it is not relevant and that it is not reasonably calculated to lead to the discovery of admissible evidence.

POD No. 3: BellSouth objects to producing any FORM 477 other than the most recent filing.

POD No. 4: BellSouth objects to this Request on the grounds that it is overbroad. BellSouth will respond to this Request for the period 1/01/01 – 6/01/01.

POD No. 7: BellSouth objects to this Request as overbroad and unduly burdensome. Subject to and without waiving these objections, BellSouth will provide a tour of 1 central office subject to reaching agreement on duration, context and number of attendees.

POD No. 13: BellSouth objects to this Request on the grounds that it is overbroad and unduly burdensome. Subject to and without waiving this objection, BellSouth will produce the initial training materials provided to LCSC representatives.

POD No. 14: BellSouth objects to this Request on the grounds that it is overbroad and unduly burdensome.

POD No. 16: BellSouth objects to this Request on the grounds that it is overbroad and unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

POD No. 19: BellSouth objects to this Request on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

POD No. 20: BellSouth objects to this Request on the grounds that it is overbroad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

POD No. 21: BellSouth objects to this Request on the grounds that it is overbroad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.


POD No. 22: BellSouth objects to this Request on the grounds that it is overbroad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

POD No. 32: BellSouth objects to this Request on the grounds that it is duplicative of Request No. 18.

WHEREFORE, BellSouth respectfully requests that the Authority sustain each of the objections set forth herein. BellSouth specifically reserves the right to make additional objections as it continues to review the requests and its responses thereto.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.



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